

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
JOHN WAYNE CALLOWAY	:	CASE NO. 1-14-04227-MDF
EARTHENIA DENISE CALLOWAY	:	
Debtors	:	
	:	CHAPTER 13
	:	
LAKEVIEW LOAN SERVICING, LLC	:	
Movant	:	
	:	
	:	
v.	:	
	:	
	:	
JOHN WAYNE CALLOWAY	:	
EARTHENIA DENISE CALLOWAY	:	
Respondents	:	

DEBTORS' RESPONSE TO MOTION OF
LAKEVIEW LOAN SERVICING, LLC
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Debtors, John Wayne Calloway and Earthenia Denise Calloway, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
 2. Admitted.
 3. Admitted.
 4. Admitted in part, denied in part. The Mortgage speaks for itself. Strict proof is
ded as to the assignment.
 5. Admitted.
 6. Admitted. Debtors offer to cure the post petition arrearage through an amended Plan.
 7. Admitted in part, denied in part. See response to paragraph 6.
 8. Denied. Any and all fees and costs related to the Motion for Relief will be resolved

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,

/s/ Gary J. Imblum

Gary J. Imblum
Attorney I.D. No. 42606
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
Attorney for Debtors

DATED: 10/21/2016

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing
DEBTORS' RESPONSE TO MOTION OF LAKEVIEW LOAN SERVICING, LLC FOR RELIEF
FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States
Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JOSHUA I. GOLDMAN, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

/s/ Carol V. Shay

Carol V. Shay, Paralegal
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
For Debtors

DATED: 10/21/2016